

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

LISA ISKRIC	:	CHAPTER 7
DEBTOR	:	CASE NO. 1-12-03839-RNO

LISA ISKRIC	:	ADVERSARY No.
v.	:	1-13-ap-00076-RNO
	:	
COMMONWEALTH FINANCIAL	:	Nature of Proceeding:
SYSTEMS, INC.	:	MOTION TO SET ASIDE
DEFENDANT:	:	DEFAULT JUDGMENT

**MOTION OF DEFENDANT COMMONWEALTH FINANCIAL SYSTEMS, INC.,
TO VACATE DEFAULT JUDGMENT PURSUANT TO F.R.B.P. 7055,
FED.R.CIV.P. 55 (c) and 60(B)**

Pursuant to Federal Rule of Bankruptcy Procedure 7055 Federal Rule of Civil Procedure 55(c) and 60(b), Defendant, Commonwealth Financial Systems, Inc., by and through its attorneys, Edwin A. Abrahamsen & Associates P.C., hereby moves this Honorable Court to Vacate the Default Judgment entered on June 6, 2013 and the Amended Order for Damages entered August 7, 2013, and permit it to present its meritorious defenses and/or claims in this matter. Defendant's requests are based on the attached Memorandum of law and Proposed Answer.

Edwin A. Abrahamsen & Associates, P.C.

DATE: August 21, 2013

BY: /s/ Edwin A. Abrahamsen
Edwin A. Abrahamsen, Esquire
PA Attorney I.D. No.: 23139
Edwin A. Abrahamsen & Associates
120 N. Keyser Avenue
Scranton, PA 18504
Attorney for Commonwealth Financial Systems, Inc.